

RW 273
JUL 27 1992

ORIGINAL
FILE

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General Manager

GREATER NEW ORLEANS EXPRESSWAY COMMISSION

P. O. BOX 7656, METAIRIE, LOUISIANA 70010 • TELEPHONE 835-3116 • FAX 835-2518

July 23, 1992

Re: 707-92

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JUL 27 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

JUL 28 1992

FCC MAIL BRANCH

Federal Communications Commission
Office of the Secretary

Dear Ms. Searcy:

I am writing on behalf of the Greater New Orleans Expressway Commission (GNOEC) in ~~opposition~~ to a petition for rule making recently filed by PacTel Teletrac with the Federal Communications Commission relating to the rules pertaining to automatic vehicle monitoring ("AVM") systems.

The GNOEC is the agency that operates the Lake Pontchartrain Causeway bridge which utilizes radio frequency technology for electronic toll collection.

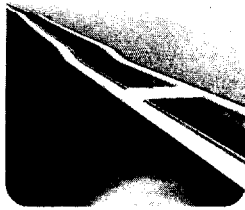
We understand that the PacTel petition would have the effect of granting exclusive future use of the 904-912 MHz and the 918-926 MHz spectrum to PacTel and similar users. This would deny us the use of this spectrum, which we need both for current extensive electronic toll collection operations and for any further expansions of AVM equipment.

Amtech Corporation AVM equipment (consisting of transponder tags, readers, and other AVM equipment) has been in operation at our facility since December 1990. A summary of its use on the Lake Pontchartrain Causeway bridge are as follows:

- * 13,500 transporter tags are in use by motorists on the Lake Pontchartrain Causeway for electronic toll collection
- * All six toll lanes on the Lake Pontchartrain Causeway bridge are equipped with the AVM equipment for non-stop electronic toll collection.
- * Over 3,500,000 toll transactions are electronically recorded each year.

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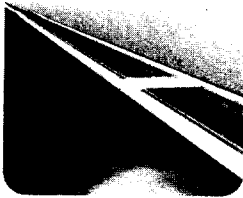
Ms. Donna R. Searcy
Federal Communications Commission

- * Motorists enjoy interagency cooperation and are able to use the same transponder to pay tolls on the Crescent City Connection bridge which is operated by the Louisiana Department of Transportation and Development.

The Greater New Orleans Expressway Commission has been able to achieve operating efficiencies which have allowed us to significantly lower the cost of tolls to motorists using the electronic system. In addition, this system has significantly reduced traffic congestion and resulting air pollution. We expect participation in the system will continue to increase at its past rapid pace.

The proposed exclusive grant of a large block of frequencies to PacTel will significantly restrict the ability to use multiple readers in facilities such as ours and could thus inhibit both the expansion of these systems and therefore the benefits to the motoring public and toll authorities alike. As such, the granting of PacTel's petition could cause a significant loss of toll revenue to the Greater New Orleans Expressway Commission and other toll facilities using this same AVM Technology.

In dealing with use of the 902-928 MHz band, we urge the FCC to maintain its policy that AVM licenses cooperate mutually. Cooperation however, should be premised on the use of reasonably robust systems designed to tolerate conditions in a shared band such as 902-928 MHz has been. We, therefore, urge you not to grant PacTel's proposal for exclusive use of a large portion of the spectrum that heretofore has been shared among many critical AVM applications. Indeed, we would support making the entire band available for AVM on a nonexclusive basis if that can be done.



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Ms. Donna R. Searcy

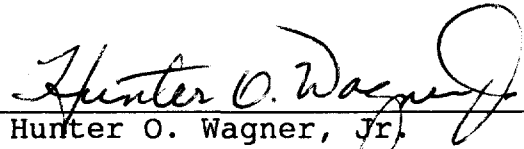
Federal Communications Commission

Enclosed please find a copy of our FCC License authorizing the Greater New Orleans Expressway Commission's use of this frequency spectrum.

Very truly yours,

GREATER NEW ORLEANS
EXPRESSWAY COMMISSION

BY:


Hunter O. Wagner, Jr.
General Manager

HOW:dpl
Encl.

RECEIVED BY

Federal Communications Commission
Gettysburg, PA 17325-7245

RADIO STATION LICENSE

JUL 27 1992

Licensee Name: GREATER NEW ORLEANS EXPRESSWAY COMMISSION

Radio Service: RS RADIOLOCATION

License Issue Date: 901218

Call Sign: WNVB960

File Number: 9010327371

License Expiration Date: 951218

Frequency Advisory No:

Number of Mobiles by Category: Vehicular - ***** Portable - ***** Aircraft - ***** Marine - ***** Pagers *****

901218N 676 1 1Z

GREATER NEW ORLEANS EXPRESSWAY COMMISSIO
LUD CONRAD
POB 7656
NEW ORLEANS LA 70010

Station Technical Specifications

FCC I.D.	Frequencies (MHz)	Station Class	No. of Units	Emission Designator	Output Power (Watts)	E.R.P. (Watts)	Ground Eleva	Ant. Hgt. To Tip	Antenna Latitude	Antenna Longitude
1:	904.01000	LR	8	20KONON	2.000	32.000	5	9	30-01-14	090-09-14
	908.00000	LR	8	20KONON	2.000	32.000				
	911.99000	LR	8	20KONON	2.000	32.000				
	918.01000	LR	8	20KONON	2.000	32.000				
	922.00000	LR	8	20KONON	2.000	32.000				
	925.99000	LR	8	20KONON	2.000	32.000				
2:	904.01000	LR	8	20KONON	2.000	32.000	5	9	30-22-50	090-03-38
	908.00000	LR	8	20KONON	2.000	32.000				
	911.99000	LR	8	20KONON	2.000	32.000				
	918.01000	LR	8	20KONON	2.000	32.000				
	922.00000	LR	8	20KONON	2.000	32.000				
	925.99000	LR	8	20KONON	2.000	32.000				
TRANSMITTER STREET ADDRESS						CITY		COUNTY		STATE
1:	3943 N CAUSEWAY BLVD				METAIRIE		JEFFERSON		LA	
2:	CAUSEWAY BLVD				MANDEVILLE		ST TAMMANY		LA	
CONTROL POINTS:LAKE PONTCHARTRAIN CAUSEWAY 3943 N CAUSEWAY BLVD METAIRIE LA										
CONTROL POINT PHONE: 504-835-3116										
SPECIAL COND: SEE ATTACHED #39										
EMISSION DESIGNATOR(S) CONVERTED TO CONFORM TO DESIGNATOR(S) SET OUT IN PART 2 OF THE COMMISSION'S RULES.										

PAGE 1 OF 1

FEDERAL
COMMUNICATIONS
COMMISSION

This authorization becomes invalid and must be returned to the Commission if the stations are not placed in operation within eight months, unless an extension of time has been granted. EXCEPTION: 800 MHz trunked and certain 900 MHz station licenses cancel automatically if not constructed within one year.